

1 Arthur A. Zorio  
2 Nevada Bar No. 6547  
3 BROWNSTEIN HYATT FARBER SCHRECK, LLP  
4 5371 Kietzke Lane  
5 Reno, Nevada 89511  
6 Telephone: (775) 324-4100  
7 Facsimile: (775) 333-8171  
8 Email: azorio@bhfs.com

9 Jennifer Ryback  
10 (pro hac vice admission pending)  
11 McGuire, Craddock & Strother, P.C.  
12 500 N. Akard Street, Suite 2200  
13 Dallas, Texas 75201  
14 Telephone: (21) 954-6800  
15 Facsimile: (214) 954-6868  
16 Email: jryback@mcslaw.com

17 *Attorneys for Defendant Catalyst  
18 Corporate Federal Credit Union*

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 LORITA L. HINES,

22 Plaintiffs,

v.

23 CATALYST CORPORATE FEDERAL  
24 CREDIT UNION, EARLY WARNING  
25 SERVICES, LLC, and WELLS FARGO  
BANK NA,

Defendants.

CASE NO.: 2:20-cv-00733-RBF-DJA

**STIPULATION TO EXTEND TIME TO  
RESPOND TO COMPLAINT**

26 WHEREAS Plaintiffs filed their Complaint on April 23, 2020.

27 WHEREAS Defendant Catalyst Corporate Federal Credit Union accepted service of the  
28 Summons and Complaint on May 14, 2020.

29 WHEREAS a response to the Complaint is due by Defendant Catalyst Corporate Federal  
30 Credit Union on June 4, 2020.

1           WHEREAS due to defense counsel and local counsel having just been retained, and the  
2 complexity of the issues, the parties have stipulated to extend the date for Defendant Catalyst  
3 Corporate Federal Credit Union to respond to the Complaint to June 26, 2020.

4           IT IS HEREBY STIPULATED BETWEEN THE PARTIES, through their attorneys of  
5 record that the deadline to serve a response to Plaintiff's Complaint shall be extended from June  
6 4, 2020 to June 26, 2020.

7           Dated: June 3, 2020

8           Respectfully submitted,

9           */s/ Miles N. Clark*

10           David H Krieger, Esq  
11           Nevada Bar No 9086  
12           KRIEGER LAW GROUP LLC  
13           500 N Rainbow Blvd., Suite 300  
14           Las Vegas, NV 89107  
15           Telephone: (702) 848-3855  
16           Email: dkrieger@knegeilawgroup.com

17           */s/ Arthur A. Zorio*

18           Arthur A. Zorio (NV Bar No. 6547)  
19           BROWNSTEIN HYATT FARBER  
20           SCHRECK, LLP  
21           5371 Kietzke Lane  
22           Reno, NV 89511  
23           Telephone: (775) 324-4100  
24           E-mail: azorio@bhfs.com

25           Matthew I. Knepper, Esq

26           Nevada Bar No 12796  
27           Miles N. Clark, Esq  
28           Nevada Bar No 13848  
29           ICNEPPER & CLARK LLC  
30           5510 S Fort Apache Rd, Suite 30  
31           Las Vegas, NV 89148-7700  
32           Telephone: (702) 856-7430  
33           Email: matthew.knepp@krtepperclark.com  
34           Email: miles.clark@knepperclark.com

35           Jennifer Ryback

36           (*pro hac vice* admission pending)  
37           MCGUIRE, CRADDOCK & STROTHER, P.C.  
38           500 N. Akard Street, Suite 2200  
39           Dallas, TX 75201  
40           Telephone: (21) 954-6800  
41           Email: jryback@mcslaw.com

42           *Attorneys for Defendant Catalyst Corporate  
43           Federal Credit Union*

44           *Attorneys for Plaintiff Lorita L. Hines*

45           **IT IS SO ORDERED:**



46           Daniel J. Albrechts  
47           United States Magistrate Judge

48           DATED: June 4, 2020

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 3<sup>rd</sup> day of June, 2020, I served the document entitled, **STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT**, on counsel of record through the CM/ECF system.

/s/ Jeff Tillison  
Employee of Brownstein Hyatt Farber  
Schreck, LLP

**BROWNSTEIN HYATT FARBER SCHRECK, LLP**  
5371 Kietzke Lane  
Reno, Nevada 89511  
Telephone: 775-324-4100